



REMARKS

Applicant respectfully requests further examination and reconsideration in view of the instant response. Claims 1-6, 10, 12-14, 17-25, 29-34 and 36-44 remain pending. Claims 1-6, 10, 12-14, 17-25, 29-34 and 36-44 are rejected.

35 U.S.C. § 112, second paragraph

According to the instant Office Action, Claims 1, 20 and 34 are rejected under 35 U.S.C. § 112, second paragraph, as being indefinite. Specifically, it is asserted that the claimed phrase "relative importance" is indefinite because it "raises a question whether or not it actually referees [sic] to the 'a dependency' as it is disclosed on the applicant's specification page 17, paragraph 1st, line 5 or the relative priority as it is disclosed on applicant's specification page 22, line 5" (instant Office Action, page 2, paragraph 4, lines 5-8).

Applicant respectfully submits that the claimed "relative importance" is definite as it is supported in the instant specification. In particular, the instant specification recites in part

A "dependency" can be said to be a relative importance of the frame.

It is noted here that a relative dependency can also be understood as a relative priority. The most expendable frames in GOP 300 are the B-frames whose dependency is D=0. The next most expendable is P frame 307 whose dependency is 2, then P-frame 304 whose dependency is 5, and I-frame 301 whose dependency is 6. The priority of each frame, therefore, is analogous to its relative dependency, with lower valued frames being more expendable than higher valued frames. (emphasis added)

Therefore, Applicant respectfully submits that embodiments the claimed "relative importance" are directed toward both a "dependency" and "a relative priority."

Accordingly, Applicant respectfully submits that the basis for rejecting independent Claims 1, 20 and 34 under 35 U.S.C. § 112, second paragraph, is traversed. Furthermore, Applicant respectfully submits that the basis for rejecting Claims 2-6, 10, 12-14, 17-19, 21-25, 29-33 and 36-44 under 35 U.S.C. § 112, second paragraph, is also traversed as these claims depend from Claims 1, 20 and 34.

35 U.S.C. § 103(a) Rejections

According to the instant Office Action, Claims 1-6, 10, 12-14, 17-25, 29-34 and 36-44 are rejected under 35 U.S.C. § 103(a) as being unpatentable over "Secure Scalable Video Streaming for Wireless Networks" by S. Wee et al. (hereinafter, "Wee") in view of "An Efficient Quality Scalable Motion-JPEG2000 Transmission Scheme" by Qiu et al. (hereinafter, "Qiu"). The Applicant has reviewed the cited references and respectfully submits that the claimed embodiments are patentable over Wee in view of Qiu.

Applicant notes that Applicant was a co-author of Wee.

Independent Claim 1 recites "separating an amount of data into a segment; and combining said segment and a transcoder readable payload header into a data packet payload, wherein said segment comprises data coded in a plurality of frames and wherein said transcoder readable payload header

comprises information associating a relative importance with each of said frames" (emphasis added). Independent Claims 20 and 34 recite similar limitations. Claims 2-6, 10, 12-14, 17-19, 21-25, 29-33 and 36-44 depend on Claim 1, 20 or 34 and recite additional limitations.

Applicant respectfully submits that "[t]o establish a *prima facie* case of obviousness ... the prior art reference (or references when combined) must teach or suggest all the claim limitations" (MPEP 2142). Applicant respectfully submits that Wee does not show or suggest "wherein said segment comprises data coded in a plurality of frames" (emphasis added) as claimed.

Applicant understands Wee to describe a method of secure scalable streaming (SSS) for wireless networks (Abstract). With reference to Section 4.1 and Figure 4, Wee recites that "the video frame is segmented into tiles" (Section 4.1). Accordingly, Wee discloses that segments include portions of video frames. In other words, each segment includes a fraction of a video frame.

In contrast, the claimed embodiments recite "wherein said segment comprises data coded in a plurality of frames". Accordingly, Applicant submits that Wee does not teach, describe or suggest the claimed embodiment. Moreover, Applicant respectfully submits that by disclosing that a "video frame is segmented", Wee teaches away from "wherein said segment comprises data coded in a plurality of frames" as claimed.

Applicant notes the assertion in the instant Office Action that Wee discloses "wherein said segment comprises data coded in a plurality of frames" by citing

[page 3, 1st column, 2nd paragraph and see figure 4, SSS coding]
(As it is shown on figure 4, on the first box, 'the video frames', which implies plurality of claims are segmented into tiles/ these implies [sic] that each tiles are comprise of plurality of frames [sic]. Furthermore, As shown on figure 4, ref. Second box, these tiles are coded. Therefore, these meets the limitation recited as wherein said segment/tiles comprises data coded in a plurality of frames" (instant Office Action, paragraph 8, page 4, lines 5-10).

However, Applicant submits that this interpretation is not supported by the teachings of Wee. For instance, with reference to Figure 4 of Wee, an SSS coder shown in the lower portion of Figure 4 while examples of the input and output to the described operations of the SSS coder are shown in the upper portion of Figure 4. As shown in the upper portion representing the output of "Segment video frames into tiles" is a single frame segmented into four tiles. Applicant understands Wee to describe that each frame of a plurality of frames are segmented into tiles.

Applicant notes that the purpose of Wee is to describe a secure scalable coding technique that allows for transcoding without decrypting the data.

Applicant notes that Wee, at Section 5.1, recites

The scalable video coding and packetization modules of the SSS coder were jointly designed to enable downstream transcoding operations to be performed by simple packet truncation. SSS coding is similar to bitstream scalable video coding, but it further partitions the video frames into scalable packets that correspond to predetermined regions or tiles in the video sequence. The JPEG 2000 image compression standard has many of these characteristics of independently coded tiles and scalability within the tile. We build upon these concepts by extending this level of

scalability to video frames and by combining it with the packetization process; furthermore, we jointly design this smart packetization with the encryption process.

Separate regions or tiles of a video frame are encoded into one or more packets. (emphasis added; Section 5.1).

Applicant respectfully submits that in order to provide scalability of video frames, Wee discloses that a "video frame is segmented into tiles" (Section 4.1), and that the interpretation presented in the Office Action is not supported by the teachings of Wee.

Furthermore, Applicant respectfully submits that Qiu does not overcome the shortcomings of Wee. Applicant understands Qiu to describe a transmission scheme for Motion-JPEG2000 video sequences over IP networks (Abstract). In particular, Applicant respectfully submits that Qiu does not teach, describe or suggest "wherein said segment comprises data coded in a plurality of frames", and is not relied upon as providing such a teaching.

Accordingly, Applicant respectfully submits that the basis for rejecting independent Claims 1, 20 and 34 under 35 U.S.C. § 103(a) is traversed and that, as a result, Claims 1, 20 and 34 are in condition for allowance. Furthermore, Applicant respectfully submits that the basis for rejecting Claims 2-6, 10, 12-14, 17-19, 21-25, 29-33 and 36-44 under 35 U.S.C. § 103(a) is also traversed as these claims depend from allowable base claims, and consequently Claims 2-6, 10, 12-14, 17-19, 21-25, 29-33 and 36-44 are also in condition for allowance.

Conclusions

In light of the above remarks, Applicant respectfully requests reconsideration of the rejected claims.

Based on the arguments presented above, Applicant respectfully asserts that Claims 1-6, 10, 12-14, 17-25, 29-34 and 36-44 overcome the rejections of record, and therefore Applicant respectfully solicits allowance of these claims.

The Examiner is invited to contact Applicant's undersigned representative if the Examiner believes such action would expedite resolution of the present Application.

Respectfully submitted,
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